

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IN RE:)	
)	
CAROL LINDA DILLE)	Case No. 18-42994-DRD
)	
Debtor(s).)	

**APPLICATION TO RETAIN REAL ESTATE AGENT TANYA BAUMGART TO MARKET
REAL PROPERTY OF THE ESTATE**

COMES NOW, Victor F. Weber, Trustee, and for his motion to retain a real estate agent states and alleges as follows:

1. That the above captioned debtor filed for relief under Chapter 7 of the United states Bankruptcy Code on November 20, 2018.
2. That Victor F. Weber is the Chapter 7 panel trustee appointed to administer the assets of this case and continues in that capacity.
3. That the Debtor's bankruptcy estate includes real properties located at
 - a. 4937 Westwood Road, Kansas City, MO 64112;
 - b. 4933 Westwood Road, Kansas City, MO 64112;
 - c. 206 E. 66th St., Kansas City, MO 64113;
 - d. 4605 Liberty St., Kansas City, MO 64112;
4. That the Trustee seeks to employ **TANYA BAUMGART** of NO BORDER'S REAL ESTATE to market and sell the property on behalf of the bankruptcy estate.
5. The terms of retention of **TANYA BAUMGART** and the services which the trustee seeks to have performed are more fully set forth in the Affidavit of **TANYA BAUMGART** which is attached as 'Exhibit A', but generally (he/she) is to market and sell the property for the benefit of the estate. The Trustee believes **TANYA BAUMGART** is a disinterested party who holds no adverse interest to the bankruptcy estate. **TANYA BAUMGART** is not related to or employed by the United States Trustee or any person employed therein. The commission for the sale of the subject property will be 6%.
6. That the Trustee believes that **TANYA BAUMGART** services are essential to obtain the best possible price for the subject property.

WHEREFORE, Victor F. Weber, Trustee, prays that this court enter an order approving the retention of **TANYA BAUMGART** and NO BORDER'S REAL ESTATE, to market and sell the real property described herein for the benefit of this bankruptcy estate, and for such further relief as the court deems just.

MERRICK, BAKER & STRAUSS, P.C.

By: /s/ Victor F. Weber
VICTOR F. WEBER MO#57361
1044 Main Street, Suite 500
Kansas City, MO 64105
(816) 221-8855 (816) 221-7886 (FAX)
Email: victor@merrickbakerstrauss.com

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing was served upon all persons requesting Electronic Case Filing (ECF) notification on October 21, 2020.

/s/ Victor F. Weber
VICTOR F. WEBER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IN RE:

CAROL LINDA DILLE

Debtor(s).

Case No. 18-42994-DRD

AFFIDAVIT OF TANYA BAUMGART

I, TANYA BAUMGART, being duly sworn, states as follows:

1. That I am a licensed real estate agent in the State of Missouri, and am associated with **NO BORDERS REAL ESTATE**, 1200 NW South Outer Road, Blue Springs, MO 64015
2. That **NO BORDERS REAL ESTATE** is a business organization engaged in the business of real estate consulting and sales in the Kansas City area.
3. That I have extensive experience in the marketing and selling of properties in this area, have worked with the Trustee on numerous properties in the past, and am familiar with the bankruptcy process.
4. That I will actively market real property of the bankruptcy estate and will solicit offers for the purchase of said properties.
5. That as compensation for my services, I and any realtor representing a purchaser will split a commission of 6%. Said fee to be paid at the closing of the sale and shall be subject to prior court approval of allowance of compensation.
6. That neither I, nor **NO BORDERS REAL ESTATE**, holds or represents any interest adverse to the estate, and are disinterested persons. That neither I, nor **NO BORDERS REAL ESTATE** are aware of any connection to any creditor or other person of interest in this case which might create a conflict of interest.
7. That no agreement has been made or will be made to share any compensation to be paid, except as the officers, employees and partners of **NO BORDERS REAL ESTATE** and any agent split resulting from the Multi Listing Service.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 20th day of October, 2020 in Blue Springs, Missouri

FURTHER AFFIANT SAYETH NOT.


TANYA BAUMGART, Realtor
NO BORDERS REAL ESTATE

EXHIBIT A